## Comments and review of Burton Creek State Park Preliminary General Plan and Draft Environmental Impact Report

Submitted by Richard Van Fossen

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Tahoe State Rec, Area

Comments and review of Burton Creek State Park Preliminary General Plan and Draft Environmental Impact Report.

Page 6 paragraph 1. In the executive summary it states that the Burton Creek State Park was acquired for the purpose of providing a large area of resource protection and outdoor recreation opportunities on the north side of the Lake Tahoe Basin. The purpose of BCSP was not for overnight camping or year round overnight temporary lodging. The purpose of BCSP is not to build Park facilities or exceedingly large campgrounds. This proposal deviates from the purpose the BCSP was acquired. BCSP has and is continuing to provide the essential services it was acquired for in its current state. To develop BCSP into a 24hr year round camping facility and residences goes against the purpose that BCSP was acquired for. Overnight camping and construction of access roads is not resource protection. It is in fact the exact opposite. This proposal is just another opportunity to develop open space and make more money at the expense of natural resources.

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- Page 6 pp2. Paragraph 2 starts out saying that the park is nothing special just typical forest on the north shore of Lake Tahoe. There is nothing typical about this area, in 43.1 fact it is very special. BCSP and the CTC Dollar property combined equal approximately 4.7 Square miles of land and according to my count there is approximately 34 square miles of land total on the North Shore of Lake Tahoe in California. This makes the BCSP equal to approximately 14% of the total land on the North shore of Lake Tahoe. This is undeveloped land ideal for low impact recreation and intense natural resource protection. Large areas of BCSP have had very high mixed conifer die off due to drought, too many trees per acre, the removal of fire from 43.2 the ecosystem, heavy logging in the past, and the outbreak of beetles and forest disease. This has been a failure of the State Park system because the number one purpose of the acquisition of the park was resource protection. There was significant damage to the park at the Burton creek road crossing at the upper end of Antone meadows where a culvert washed out and wasn't repaired for at least 15 years. Blame was placed on vehicles and roads in signs along the restoration area. Many of the old cabin sites with little remaining were in fact some of the first communities in the Lake Tahoe area and can be located on some of the very old maps of the region.
- Page 6 pp3. States that the property is surrounded by undeveloped U.S.Forest service land. This is absolutely untrue and should be removed from the Executive Summary. BCSP is sandwiched between residential communities on the south (Lake forest), west (Tahoe City) and east (Dollar Hill and Old County Road Subdivisions) with undeveloped National Forest Land on the north side of BCSP.

of the old barb wire fence can still be located.

These communities sprang up around range allotments and Timber harvesting. Some

Page 7pp2. States that the dollar parcel was acquired by the California Tahoe Conservancy for the protection of the property's natural resources and make the land open to the public. The main reason the CTC purchases open space property is to prevent it from being developed. This means No Facilities and no paved roads.

Comment on BCSP General plan and draft environmental impact report. (cont.)

Page 7pp5. The plan states that to better accommodate local traffic and environmental conditions the proposed campground is for 1-200 sites, instead of a much larger facility. My experience is that a campground with 100 sites or so is quite large and has significant environmental consequences and traffic issues.( see Fallen Leaf Campground and associated mass trampling and traffic issues). Would prefer a lower maximum in the proposal say 0-100 campsites - 500 to 1,000 persons a day would be added to this area exceeding the carrying capacity of the land and its natural resources.

Page 7pp6. Traffic along highway 28 should be allowed to reach a LOS of D or better before additional development and traffic is added. A large development (condominiums) has been approved for the Nahas property that is adjacent to the CTC Dollar parcel. This will add significant congestion and traffic problems to the Dollar Hill area of highway 28. The new condo development will also add a significant number of recreationists to the CTC Dollar property and BCSP.

Page 8pp1. I support designing the facilities, roads, and trails to accommodate travel by foot, bike and ski, but I feel the location of proposed campgrounds are too far from Tahoe City to have this happen. There are several other locations that would be close enough to Tahoe City. The new Campground and facilities could be built around current facilities at The State Recreation Area near Tahoe City. Another location would be north west of the SRA (39 degrees 11',25" North longitude by 120 degrees 08', 20") This area is close enough to Tahoe City for significant foot traffic. May have Lake views as well. No Lake views with current proposed locations for campgrounds. These new proposed campground locations would also better protect sensitive natural resource areas in other parts of the park and would centralize park operations requiring a much shorter access road with less mechanical disturbance and would not impact natural preserve areas.

Page 8pp6. Natural Resources: I don't understand how a new 2 lane road, 100-200 campsites plus additional year round cabins or yurts meets the criteria for this paragraph. I feel that the surveys of plant and animal populations are general and not detailed enough to show the species that are rare and listed for special protection. I feel that developing large paved roads (camp ground access) and an additional 1,000 people per day during the summer cannot "protect and ensure the perpetuation of native wildlife species populations at Burton Creek State Park." I also feel that with the proposed recreational facility development that the State Park cannot "Provide special protection for listed species, as well as for other exceptional natural resources."

Page 9pp7 "The activities proposed herein **generally** do not pose long term significant impacts on the environment." This is not supported by facts. There are current significant environmental impacts occurring under current use! The bears are learning we are a source of food and then they must be killed. The roads cause

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barriers for reptiles and amphibians to cross. Disposal of waste poses the threat of leaks and spills. Heavy use of the area reduces the quality of experience e.g. instead of walking on a trail you are dodging mountain bikes and taking other routes to avoid other hikers on the trails. I currently do most of my walking in this area away from roads or trails in order to have any quality experience due to current over use in this area. My estimates of traffic on most trails in the BCSP & CTC Dollar Parcel is 8 hikers or mountain bikers an hour with higher use during summer peak times. I feel that more accurate public use figures need to be developed and counters need to be placed in high use areas to get more accurate numbers on current use!! The guided commercial mountain bike tours have disappeared for now, but will probably return.

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Page 10 pp2. Local residents created most of the existing trails. This is not exactly what has happened. Local residents created trails by repetitively walking or riding their mountain bikes over the same route. They did not use machinery, hand tools or imported dirt to make trails. The State Park has used machinery, hand tools and imported dirt to make trails. This poses some environmental risks to the existing natural resources. Local residents pose less risk of biological contamination and unwanted species introduction than visitors from throughout the U.S. and have less impact than machinery or hand tools.

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Page 11pp3. This is not a very clear statement. I believe that the CTC has these purposes but not to develop facilities and paved two lane roads that the State Park proposes.

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Page 12pp1. "The quiet of the park is contrasted by the bustle of people recreating." This is a description of the current situation in BCSP and hints that it is about at or over its carrying capacity for recreationists. Last year I filed a complaint with the orienteering event using the park because they placed one of their course markers next to my neighbors house in the stream bed. Participants ran through my yard down the street and all over my neighbors yard trying to locate the marker. The orienteering group must have run out of area to have there event in the BCSP and had to run a portion of it in and through the residential area.

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Page 13pp2. Primary reason for the general plan is for the development of campgrounds. Not to determine the baseline or thresholds of recreational use or for the protection of natural resources. The CTC acquired the Dollar parcel to prevent development, protect natural resources and provide public access. The Dollar parcel was not acquired for construction of State facilities and development of recreation for profit!!

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Page 15. Continued inaccuracy and statement of fact that is untrue. The highlands subdivision is nearly 80% home owner occupied. Almost all second homes in the subdivision that are not occupied by their owner are rented by full time residents.

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Page 16. Why isn't the Ward unit listed for General plan Development for campgrounds?? It appears to be a good site!!

- Page 19 and 20. The statement that the Dollar Creek dam serves no purpose should be discussed with TRPA and Lahontan Water Quality. Counties in the Lake Tahoe Basin have had to make water runoff holding ponds to allow sediment to settle before running into Lake Tahoe. Dollar reservoir is an excellent settling pond for the so called erosion from trails and roads on the CTC Dollar parcel!! Beavers inhabit the pond as well as fish frogs and salamanders. There is also unusual (for this area) plant communities associated with the north side of the reservoir.
- Page21pp1 The plant community has a number of spring annuals that have yet to be described. These plants are not yet identified yet in pp 4 it states that no rare or endangered species have yet been identified. I know of an anenome plant that is found only in the BCSP and 2-3 acres of National Forest Land near Old County Road. I'm sure that plant surveys are incomplete at best. Most focused on meadows with short time frames. Plants that appear early in the season are quite often missed due to poor access. Dodecatheon alba has been found in the Park but it is not recorded in any surveys that I've seen.
- Page 22 pp1 Plan states that recent surveys for goshawk and spotted owl are complete. But what is absent in this statement is that they are found within the BCSP or the CTC Dollar Parcel and must be protected under State Law. I see no mention of how the Park is protecting these animals at this time, or how development of the park with campgrounds and increased recreation is going to protect or enhance their habitat.
- Page 26pp1. BCSP has made "improvements" to the trails in the park. One problem I have with the improved condition of many of the trails is that the recreationist cannot obey trail etiquette and let others pass because the trail sides are lined with big logs or rocks that prevent you from pulling to the side of the trail to let others pass! I believe this improved trail situation poses a liability due to potential accidents that will occur with increased use on these trails.
- Page 27pp2. Current use figures are w.a.g. estimates and need to be known more accurately before statements about NO significant Environmental impacts can be stated. It is difficult to make sweeping statements about projects with so much unknown even at present time. My estimate on current use puts 42,350 people a year-visit the BCSP & Dollar Parcel. Hikers walk approximately 2.5 miles per visit and mountain bikers ride approximately 8.5 miles per visit. There is very little horse back recreation in BCSP or CTC Dollar Parcel.
- Page 28 pp1&2 Thresholds that indicate that the carrying capacity of the land has been exceeded and natural resources are being degraded not protected. The current 36 indicators had a majority that were not in compliance and were in a negative fashion. Although the TRPA is tending to change these indicators in a manner that might favor development. What price Tahoe??
- Page 28pp5. Traffic and congestion currently as bad as can be rated by Caltrans.